

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Daniel J. Ferst
Tara M. Ferst

Debtors

SN Servicing Corporation as
servicer for NS0154 LLC

Movant

v.

Daniel J. Ferst
Tara M. Ferst
Scott F. Waterman- Trustee
Respondents

CASE NO.: 17-13720-amc

CHAPTER 13

Judge: Ashely M. Chan

Hearing Date: November 25, 2020 at 11:00 am

Objection Deadline:
November 13, 2020

NOTICE OF MOTION FOR RELIEF FROM
AUTOMATIC STAY

SN Servicing Corporation as servicer for NS0154 LLC has filed a Motion for Relief from Stay with the Court in order to gain Court authority to foreclose on real property known as 65 Pine Ln, Gilbertsville, PA 19525-9116.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before November 13, 2020 (14 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Court
United States Bankruptcy Court
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Lorraine Gazzara Doyle
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 230
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on November 25, 2020 at 11:00 am, at Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: October 30, 2020

By: /s/Lorraine Gazzara Doyle
Lorraine Gazzara Doyle, Esq.
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TO:

Trustee

SCOTT F. WATERMAN (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Debtor's Counsel

Daniel P. Mudrick, Esquire
Mudrick & Zucker, PC
325 Sentry Parkway East
Building 5 West - Suite 320
Blue Bell, PA 19422

U.S. Trustee

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

Debtors

Daniel J. Ferst
65 Pine Lane
Gilbertsville, PA 19525-9116

Tara M. Ferst
65 Pine Lane
Gilbertsville, PA 19525-9116